

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANTS' UNOPPOSED MOTION TO EXCEED PAGE LIMITS
AND EXHIBIT PAGE LIMITS ON A MOTION TO COMPEL DISCOVERY
REGARDING STANDING AND REAL PARTY IN INTEREST**

Defendants Samsung Electronics Co., Ltd and Samsung Electronics America, Inc. (“Samsung”) respectfully submit this motion to exceed page limits on its Motion to Compel Discovery Regarding Standing and Real Party in Interest, filed concurrently herewith. Samsung has conferred with Plaintiff Headwater Research LLC (“HWR”), who does not oppose this request.

Samsung seeks to exceed:

- The seven (7) page limit for discovery motions by two (2) pages, such that its motion to compel will be nine (9) pages total.
- The five (5) page limit for discovery motion exhibits by ninety-three (93) pages, such that the number of exhibits will be thirty (30) total.

Good cause exists for this request. Samsung’s Motion to Compel seeks discovery regarding HWR’s standing and RPI. This Motion is factually dense, setting forth the many corporate machinations ultimately culminating in the current shell plaintiff, HWR. Samsung seeks a modest two extra pages to (concisely) outline these facts for the Court’s benefit and consideration. Further,

Samsung's motion is supported by/based on many state Secretary of State and tax filings, discovery requests/responses, privilege log entries, and correspondence between the parties. Samsung seeks to exceed the exhibit page limit to provide the Court with the relevant portions of these documents underlying this dispute.

Exhibit	Description
1.	Texas Form 308, HWR Application for Registration, dated July 17, 2018
2.	Excerpts from HWR's Second Amended Privilege Log, dated February 7, 2024
3.	HWR's 2022 Texas Franchise Tax report, dated March 24, 2022
4.	Texas Form 304, HWI's Application for Registration of a Foreign LLC, dated May 24, 2022
5.	HWI's California Registration of an Out-of-State LLC, dated April 13, 2022
6.	HWI's Delaware Certificate of Formation of an LLC, dated April 6, 2022
7.	HW Inv. I's Delaware Certificate of Formation of an LLC, dated April 7, 2022
8.	HW Inv. I's California Registration of an Out-of-State LLC, dated April 13, 2022
9.	IMP's California Articles of Organization of an LLC (dated May 16, 2022) and California Statement of Information of an LLC (dated December 4, 2023)
10.	HWR Merger Sub's Delaware Certificate of Formation (dated May 24, 2022) and Certificate of Merger merging with and into HWR (dated June 21, 2022)
11.	HWR's Delaware Certificate of Merger merging HERO Merger Sub with and into HWR (dated June 21, 2022); HWR's Delaware Certificate of Merger merging HWR Merger Sub with and into HWR (dated June 21, 2022); and HWR's Certificate of Conversion from a Delaware LLC to a Non-Delaware Entity (dated September 29, 2022)
12.	HW Inv. II's Delaware Certificate of Formation, dated May 25, 2022
13.	HWR's Texas Certificate of Conversion, dated September 15, 2022
14.	HWI's 2023 Texas Franchise public tax filing
15.	HWI's 2024 Texas Franchise public tax filing
16.	HWR's 2023 Texas Franchise public tax filing
17.	HWR's 2024 Texas Franchise public tax filing
18.	Excerpts from HWR's Objections and Responses to Defendants' First Set of Requests for Admission, dated February 28, 2025
19.	IPR2023-01362 Patent Owner's Power of Attorney
20.	Excerpts from Trial Transcript, dated January 17, 2025, from <i>HWI</i> (cover page mistakenly says January 16)
21.	Email correspondence between Counsel, dated January 3 through January 20, 2025
22.	Email correspondence between Counsel, dated January 22 through January 28, 2025
23.	Email correspondence between Counsel, dated January 31 through February 4, 2025
24.	Email correspondence between Counsel, dated February 7 through March 10, 2025
25.	Excerpts from Headwater's Objections and Responses to Defendants' Second Set of Interrogatories, dated February 28, 2025
26.	Correspondence from Defendants' Counsel, dated March 3, 2025

Exhibit	Description
27.	Email correspondence between Counsel, dated March 12 through March 18, 2025
28.	Excerpts from the June 14, 2024 Deposition Transcript of Gregory Raleigh, from <i>HW2</i>
29.	Excerpts from the March 7, 2024 Deposition Transcript of Gregory Raleigh, from <i>HW1</i>
30.	Graphic timeline of events

Dated: March 21, 2025

Respectfully submitted,

By: /s/ Thad C. Kodish

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ATTORNEYS FOR DEFENDANTS
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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants have met and conferred in compliance with Local Rule CV-7(h). Plaintiff does not oppose this motion.

/s/ Thad C. Kodish

Thad C. Kodish

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on March 21, 2025. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Thad C. Kodish

Thad C. Kodish